

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

ROMAN CATHOLIC CHURCH OF THE
ARCHDIOCESE OF SANTA FE, a New
Mexico corporation sole,

Debtor.

Chapter 11

Case No. 18-13027-t11

**MOTION TO SHORTEN OBJECTION DEADLINE TO DEBTOR’S MOTION TO
APPROVE POST-PETITION LENDING PURSUANT TO THE CARES ACT ON AN
EMERGENCY BASIS**

The Roman Catholic Church of the Archdiocese of Santa Fe, Debtor-in-Possession in the above captioned Chapter 11 case (the “Debtor”), by counsel, respectfully requests that the Court enter an order shortening the deadline for objections to be timely filed to the Debtor’s Motion to Approve Post-Petition Lending Pursuant to the CARES Act on an Emergency Basis, filed April 28, 2020 as Doc. No. 355 (the “Motion”):

1. Bankruptcy Rule 9006(c) provides, in pertinent part, that “when an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or without motion or notice order the period reduced.”

2. The Debtor seeks a reduction of the 21-day period for objections to be timely filed to the Motion to 10 days.

3. Sufficient cause exists for the reduction of time.

4. Under the Coronavirus Aid, Relief, and Economic Security Act, H.R. 748 (the “CARES Act”), Congress and the President temporarily added a new program entitled the

“Paycheck Protection Program” to the SBA’s 7(a) Loan Program (hereinafter referred to as the “PPP”).

5. The Debtor has determined that the Debtor should be eligible PPP funding and has applied for funds under the PPP with Wells Fargo Bank.

6. It is in the best interest of the Debtor, the creditors and the Debtor’s estate for the Debtor to apply for and obtain funds under the PPP.

7. The funds approved by Congress and the President will be rapidly exhausted. If the Debtor is approved for PPP funds, they are supposed to be funded within 10 days of approval.

8. Shortening the deadline to object to the Motion is necessary in order to ensure that the Debtor has an opportunity to obtain the PPP funds before the funding is exhausted.

9. No parties with a pecuniary interest in this case will be prejudiced if the deadline is shortened.

WHEREFORE, the Debtors respectfully requests that the Court enter an order in substantially the form attached hereto as Exhibit A reducing the period for objecting to the Motion from 21 days to 10 days.

Respectfully submitted,
WALKER & ASSOCIATES, P.C.
s/ filed electronically
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I hereby certify that, on May 1, 2020, in accordance with NM LBR 9036-1 and Fed. R. Civ. P. Rule 5(b)(3), a true copy of the foregoing was served via the Court’s

CM/ECF notification facilities to those parties who are registered CM/ECF participants in this case and otherwise as indicated above.

s/ filed electronically

Thomas D. Walker

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

ROMAN CATHOLIC CHURCH OF THE
ARCHDIOCESE OF SANTA FE, a New
Mexico corporation sole,

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Chapter 11

Case No. 18-13027-t11

**ORDER SHORTENING OBJECTION DEADLINE FOR DEBTOR'S MOTION TO
APPROVE POST-PETITION LENDING PURSUANT TO THE CARES ACT ON AN
EMERGENCY BASIS**

This matter came before the Court on the motion to shorten the objection deadline to Motion to Approve Post-Petition Lending Pursuant to the CARES Act on an Emergency Basis filed on April 28, 2020 (Doc. No. 355) (the "Motion") filed by Roman Catholic Church of the Archdiocese of Santa Fe, Debtor-in-Possession in the above captioned Chapter 11 case (the "Debtor"). Having reviewed motion to shorten deadline, the Motion, and the record, the Court finds:

EXHIBIT A

1. Bankruptcy Rule 9006(c) provides, in pertinent part, that “when an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or without motion or notice order the period reduced.”

2. There is good cause to shorten the objection deadline to respond to the Motion.

3. The Debtor has represented that no parties in interest will be prejudiced by shortening the objection period.

IT IS THEREFORE ORDERED that the deadline for filing objections to the Motion shall be shortened from 21 days to 10 days.

###END OF ORDER###

Submitted by:

WALKER & ASSOCIATES, P.C.
/s/ submitted electronically 05/01/2020
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EXHIBIT A